

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

PRO SE PRISONER CIVIL RIGHTS COMPLAINT

Jeremy Glenn Roberts

Plaintiff's full name (Please print)

v.

Case No. _____

(To be filled out by Clerk's
Office only)

Chris Bryant, individually and officially

Defendant(s)' full name (Please print)

Dexa Atwood, individually and officially

Clay Lintner, individually and officially

Rory Dunham, individually and officially

Turn Key Health Clinics, LLC, see attached

For additional names please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section IV, pursuant to Fed. R. Civ. P. 10(a).

NOTICE

Federal Rule of Civil Procedure 5.2 and Local Civil Rule 5.3 address the privacy and security concerns resulting from public access to electronic court files. Under these rules, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Each claim you raise must be properly exhausted. If the evidence shows that you did not fully comply with an available prison grievance process prior to filing this lawsuit, the court may dismiss the unexhausted claim(s) or grant judgment against you. See 42 U.S.C. 1997e(a).

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

I. JURISDICTION

Indicate below the federal legal basis for your claim, if known.

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)

II. PLAINTIFF INFORMATION

Jeremy Glenn Roberts

Full name

Aliases

000738

Prisoner ID #

Carter County Detention Center

Place of Detention/Incarnation

100 S. Washington St.

Institutional Address

Ardmore

City

O.K.

State

73401

Zip Code

III. PRISONER STATUS

Indicate whether you are a prisoner or other confined person as follows:

- ☒ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

IV. DEFENDANT(S)' INFORMATION

List the following information for each defendant. If the correct information is not provided, it could result in the delay or prevention of service. Make sure that the defendant(s) listed below are identical to those contained on the first page. Attach additional sheets of paper as necessary. Do not write on the backs of any additional sheets. See Local Civil Rule 5.2(a).

Defendant 1: Chris Bryant, individually and officially
Full Name
Sheriff of Carter County
Current Job Title
100 S. Washington St
Current Work Address
Ardmore O.K. 73401
City State Zip Code

Defendant 2: Debra Atwood, individually and officially
Full Name
Jail Administrator
Current Job Title
100 S. Washington St.
Current Work Address
Ardmore O.K. 73401
City State Zip Code

Defendant 3: Clay Lintner, individually and officially
Full Name
Tail Administrator
Current Job Title
1005. Washington St.
Current Work Address
Ardmore O.K. 73401
City State Zip Code

Defendant 4: Rory Dunham, individually and officially
Full Name
Orthopedic Surgeon
Current Job Title
Mercy Plaza 731 12th Ave. N.W. Suite 203
Current Work Address
Ardmore Oklahoma 73401
City State Zip Code

Defendant 5: Turn Key Health Clinics, LLC
Full Name
Tail Health Provider
Current Job Title
100 S. Washington St.
Current Work Address
Ardmore O.K. 73401
City State Zip Code

V. STATEMENT OF CLAIMS

A. Claim 1

Date(s) of occurrence: 4/18 - 12/12

Place(s) of occurrence: Carter County Detention Center

State which of your federal constitutional or federal statutory rights have been violated:

8th & 14th amendments

Briefly state the FACTS that support your case. Provide a short and plain statement of how each named defendant was personally involved in the violation of your constitutional rights and why you are entitled to relief from each named defendant. See Fed. R. Civ. P. 8(a). Do not cite case law.

FACTS: My arm got broken. I'm being refused proper medical treatment, medicines, and surgeries. I've been in a lot of pain since the incident. I've sent letters and grievances to Chris Bryant, Debra Atwood, Clay Lintner, Nurse Emily, and Turn Key Health Clinics, LLC. See exhibit A

B. Claim 2

Date(s) of occurrence: 4/18 - 12/12

Place(s) of occurrence: Carter County Detention Center

State which of your federal constitutional or federal statutory rights have been violated:

8th & 14th amendments

FACTS: The jail is making me pay for all of my medical. They made me sign an agreement at the hospital to pay for my own surgery or not get treatment. They made me sign for a \$38,000 medical bill. They are charging my jail account for medicine and appointments and aftercare.

C. Claim 3

Date(s) of occurrence: 4/26 - 4/28

Place(s) of occurrence: Mercy Hospital, Ardmore, O.K.

State which of your federal constitutional or federal statutory rights have been violated:

8th & 14th Amendments

FACTS: Dr. Roy Dunham was supposed to perform a hardware removal. When I came out of surgery my arm was still offset instead of removing a plate he added another plate. The doctor didn't tell me what he did or that there were complications. My POA, Diane Walters found out 2 months later.

D. Claim 4

Date(s) of occurrence: 4/18 - 11/1

Place(s) of occurrence: Carter County Detention Center

State which of your federal constitutional or federal statutory rights have been violated:

1st, 8th, and 14th Amendments

FACTS: I was kept on 23 hour lockdown because of my injury for 7 months. I requested to be able to attend church services and was denied by Clay Lintner. I was also denied all religious materials. Bibles and other Holy Books are considered contraband still.

VI. RELIEF REQUESTED

Briefly state what you want the Court to do for you. Do not make legal arguments or cite cases or statutes.

I request immediate medical attention, the surgeries I need and the proper meds. I request compensatory damages in the form of all current and future medical expenses and lawyer and court fees. I request punitive damages from each defendant in the amount of \$1,000,000 each. I request all inmates be allowed to attend church and all Holy Books not be considered contraband and be allowed.

VII. PRISONER'S LITIGATION HISTORY

The "Three Strikes Rule" bars a prisoner from bringing a civil action or an appeal in forma pauperis in federal court if the prisoner has "on three or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

Have you brought any other lawsuits in federal court while a prisoner?

☐ Yes ☒ No

If yes, how many? _____

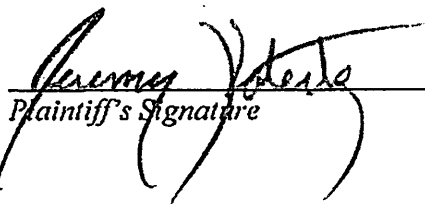
Number each different lawsuit below and include the following:

- Name of case (including defendants' names), court, and docket number
- Nature of claim made
- How did it end? (For example, if it was dismissed, appealed, or is still pending, explain below.)
- Did the court assess a "Strike" or find the dismissal a "Prior Occasion" pursuant to 28 U.S.C. 1915 (g).

VIII. PLAINTIFF'S DECLARATIONS:

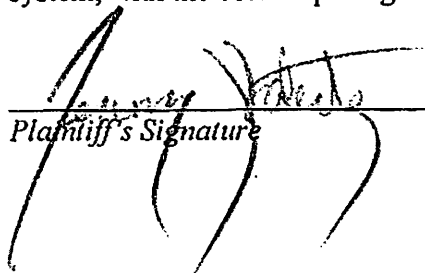
I declare under penalty of perjury that the foregoing is true and correct. To the best of my knowledge, information, and belief, this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11 of the Federal Rules of Civil Procedure.

I agree to provide the Court Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Court Clerk's Office may result in the dismissal of my case.


Plaintiff's Signature

12/15/23
Date

I further declare under penalty of perjury that I placed this complaint in the prison's legal mail system, with the correct postage attached, on the 15 day of December, 2023


Plaintiff's Signature

12/15/23
Date

Defendants

Chris Bryant, individually and officially
Devra Atwood, individually and officially
Clay Lintner, individually and officially
Roy Dunham, individually and officially
Turn Key Health Clinics, LLC
Nurse Emily EBLPN, individually and officially
Jenny Saunders, individually and officially
Jail Administrator
100 S. Washington St
Acire, O.K. 73401

CLAIM # 5

8th & 14th Amendments

In February 2023 I was placed in C-Block in the Carter County Detention Center. C-Block is composed of pre-trial detainees and convicted inmates awaiting transport to D.O.C. In April I got jumped by 3 convicts waiting to go to D.O.C. I sustained a broken Ulna that required a \$38,000 surgery and a broken elbow. I am needing an elbow replacement for that. It is the Sheriff's policy to house pre-trial detainees and convicts together. Jenny Saunders was the Jail Admin at the time of this incident. I also suffered 2 black eyes, a fractured eye socket, busted lip, and permanent pain in my neck. I have struggled with severe anxiety, paranoia, and P.T.S.D. since this incident.

12-15-23

~~Jenny Roberts~~
Jeremy Roberts

Carter County Detention Center
100 S. Washington St.
Ardmore, O.K.
73401

Exhibit A

My Name Is Jeremy Glenn Roberts
 I am an Inmate at the Carter County
 Detention Center I've Been In Custody Here
 Since January 17th 2023 During that Time
 I was jumped by 3 Inmates & beaten
 severely & sustained a broken arm &
 elbow I needed several surgeries I've
 received one botched surgery on my
 ulna In which Carter County made
 me sign for the bill to receive medical
 treatment that they were responsible for
 I was Billed 38,000\$ for a Hoot
 where Removal In which the
 Surgeon did not do correctly & now my
 Arm is malformed I also need a full
 Elbow Replacement that they haven't gotten
 me to the proper specialist to receive
 proper medical treatment It's been 8 months
 since I sustained these injuries during
 this time I've been refused my proper
 medications prescribed by the Doctors &
 specialists I was verbally assaulted by
 medical staff I was physically assaulted
 by the Jail Administrator (Doc Turner
 & Shaved down while still Healing from
 my arm surgery causing more pain &
 suffering I've been held in a Medical
 23/1 lockdown for 7 months while

receiving Inadequate medical treatment
 I've been referred to 2 specialists
 for an elbow replacement in which
 one of them refused to take care of medical
 billing obligations & still hasn't
 seen the other. A nurse said I
 would sometime this year & that
 she thinks they are trying to wait
 me out so DOC has the pay for
 my medical. My injuries have caused
 me tremendous pain & suffering
 physically & mentally

Dec 12. 2023

Jeremy Roberts
 Jeremy Roberts

Carter County Detention Center
 100 S. Washington
 St. James, OK
 73401

Exhibit B

Grievance Dates

- 4/18 lots of pain, meds aren't working
- 4/20 medical grievance Clay Lintner
- 4/28 saw ortho
- 4/29 Nurse Kelly
- 5/05 meds family picked up / call provider for approval
- 5/08 elbow hurts KDLPN
- 5/11 power of attorney request medical records — they said to contact Turn Keys main office at 405-516-0276
- 5/12 Clay Lintner unsubstantiated request for meds claiming it is Turn Keys policy
- 5/13 request to speak to Sheriff about medical policy and needs
- 6/01 post op appointment cancelled. still in pain KDLPN
- 6/17 no church in medical pool Clay Lintner
- 7/01 medical bill for follow up — Nurse said facility charges YOU
- 7/13 not going to medical consultation Clay Lintner wants to know who told Jeremy he wasn't going?
- 7/25 requesting info about medical appointment Devra Atwood
- 9/17 nurse says its up to JA Atwood whether I get surgery
- 9/18 Devra said she will talk to medical
- 10/28 pain
- 11/06 indomethacine dosage 25mg should be 50mg AHLPN
- 11/21 pain